

EXHIBIT 3

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

--oOo--

WAYMO LLC,

Plaintiff,

vs.

Case No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

_____ /

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

30(b)(6) VIDEOTAPED DEPOSITION OF

LIOR RON, VOLUME II

MONDAY, OCTOBER 2, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2716667A

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1 BY MR. CHERNY: 10:25:17

2 Q. When you say "preparing for," right now I

3 just want to make it clear.

4 I'm focusing on the decision to commission

5 the Stroz report, not the preparation for the 10:25:25

6 report.

7 Do you understand the clarification?

8 A. I do now. Thanks for clarifying.

9 Q. Okay. Did Lior Ron have any part in the

10 conversations that led to the commissioning of the 10:25:36

11 Stroz report?

12 A. I don't recall exactly. I believe this

13 was raised from the lawyers. And my contribution

14 was following up and preparing for that process.

15 Q. Did you have any participation in choosing 10:25:54

16 Stroz versus any other forensics organization?

17 A. No, I did not.

18 Q. Okay. Did you know anyone prior to that

19 time at Stroz Friedberg?

20 A. No, I did not. 10:26:10

21 Q. Did Ottomotto have any interactions or

22 business with Stroz Friedberg?

23 A. I do not believe so.

24 Q. Okay. So we know that you've already

25 looked at the report. So there's no issues, I take 10:26:21

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1 it, in terms of confidentiality with looking at the 10:26:23
2 report; is that correct?
3 You raised the --
4 A. I'm not a legal expert, but I've looked at
5 the report before. 10:26:34
6 Q. Okay. Did you look at the re- -- when was
7 the first time you saw the report?
8 A. I believe near the time it was published
9 or shared.
10 Q. Okay. Why, from Ottomotto's perspective, 10:26:45
11 would you have been looking at that report?
12 A. Well, at first I was looking at the report
13 for my personal capacity to see the section that
14 pertained to me.
15 Q. Okay. That was first. That suggests 10:27:02
16 there was another thing that was going to follow
17 first.
18 A. That's how --
19 MR. RABIN: Just give me a second.
20 Objection; form. 10:27:10
21 MR. CHERNY: And I really don't mind if you go
22 slowly and help Mr. Rabin out.
23 BY MR. CHERNY:
24 Q. So I asked you, again, from Ottomotto's
25 perspective, why you were looking at it. 10:27:17

1 FEDERAL CERTIFICATE OF DEPOSITION OFFICER
2 I, ANRAE WIMBERLEY, CSR NO. 7778, do hereby
3 declare:

4 That, prior to being examined, the witness
5 named in the foregoing deposition was by me duly
6 sworn pursuant to Section 30(f)(1) of the Federal
7 Rules of Civil Procedure and the deposition is a
8 true record of the testimony given by the witness;

9 That said deposition was taken down by me in
10 shorthand at the time and place therein named and
11 thereafter reduced to text under my direction;

12 --X-- That the witness was requested to
13 review the transcript and make any changes to the
14 transcript as a result of that review pursuant to
15 Section 30(e) of the Federal Rules of Civil
16 Procedure;

17 ----- No changes have been provided by the
18 witness during the period allowed;

19 ----- The changes made by the witness are
20 appended to the transcript;

21 ----- No request was made that the
22 transcript be reviewed pursuant to Section 30(e) of
23 the Federal Rules of Civil Procedure.

24 I further declare that I have no interest in
25 the event of the action.

I declare under penalty of perjury under the
laws of the United States of America that the
foregoing is true and correct.

WITNESS my hand this 3rd day of October, 2017.



ANRAE WIMBERLEY, CSR NO. 7778